

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

DAVON STEPHENS,

Plaintiff,

v.

SOUTH CAROLINA DEPARTMENT OF  
JUVENILE JUSTICE, KADIJAH  
HOLLOMAM, JOHN DOE, JANE DOE,

Defendant.

Civil Action Number: 2:24-cv-6427-DCC-MGB

**PLAINTIFF'S ANSWERS TO LOCAL  
RULE 26.01 INTERROGATORIES**

Plaintiff submits the following Disclosures pursuant to Local Rule 26.01:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**None.**

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**Plaintiff's claims should be tried by jury as this matter involves claims which arise under 42 U.S.C. Section 1983.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**N/A.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division.

The subject matter of this action arose in Richland County, South Carolina. Plaintiff is a resident of Richland County, South Carolina and Defendant South Carolina Department of Juvenile Justice is a government entity existing under the laws of the State of South Carolina and has facilities located throughout South Carolina, including Richland County. Kadajah Holloman is a resident of Richland County, South Carolina. This Court has federal question and supplemental jurisdiction pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1367 because: (i) the federal law claims arise under the constitution and statutes of the United State; and (ii) any claims stated herein that may arise under state law are so closely related to the federal law claims as to form the same case or controversy under Article III of the United States Constitution.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?

**Yes. Davon Stephens v. South Carolina Department of Juvenile Justice, Case #: 2024-CP-40-06671.**

Respectfully submitted,

November 13, 2024  
Charleston, South Carolina

BOLES LAW FIRM, LLC

s/Daniel C. Boles

Daniel C. Boles, Federal Bar #: 12144  
3870 Leeds Avenue, Suite 104, 29405  
248 E. Washington Street, 29488  
101 McGee Street, 29601  
843.576.5775 *office*  
864.770.7705 *office*  
800.878.5443 *fax*  
dan@boleslawfirmllc.com